

U.S. Department  
of Transportation

United States  
Coast Guard

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Feb 10, 1995

Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

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Ref: MD Docket No. 95-3, Assessment and Collection of Regulatory Fees for Fiscal year 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Dear Mr. Secretary:

In accordance with 47 CFR Section 1.419, the U.S. Coast Guard submits the following Comments in response to the Notice of Proposed Rulemaking in the above-captioned proceeding.

The National Boating Safety Advisory Council unanimously adopted the following resolution last year: "Motion: That the recent increase in fees that the FCC is charging for radio licenses constitutes a possible safety hazard and that the Council should go on record opposing it for safety."

On October 5, 1994, the Coast Guard wrote the enclosed letter to strongly support comments by Commissioner Quello last year to "look very carefully next year when the Commission has some discretion to modify fees, at making cuts that are fair and logical". The Commission responded in this Notice by proposing a reduction in annual regulatory fees for Marine Ship Station licenses from the current \$7 to \$3. Appendix D of this Notice shows that even with this reduction, regulatory fees from marine licenses will support 60 FTEs (persons) "representing the costs applicable to our enforcement, policy and rulemaking, international activities and our information services. 47 USC 159(a)." (NPRM para. 8).

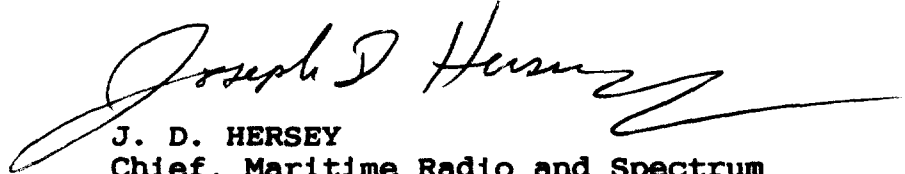
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We support the Commission's proposal. Any lessening of this fee should help reduce the safety disincentive caused to boaters voluntarily carrying a marine radio for safety of life purposes.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph D. Hersey", with a long, sweeping horizontal line extending to the right.

J. D. HERSEY  
Chief, Maritime Radio and Spectrum  
Management  
Telecommunication Management Division  
By Direction

Enclosure (1): Oct 5, 1994, letter from Coast Guard Acting Commandant to Honorable Reed E. Hundt.

Copy: FCC Wireless Bureau

U.S. Department  
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The Honorable Reed E. Hundt  
Chairman, Federal Communications Commission  
1919 M Street, N.W.  
Washington, DC 20554

Dear Mr. Chairman:

Thank you for your letter of May 6 informing us of your inability to waive annual regulatory fees for Marine Ship Station licenses without Congressional authorization. You stated that proposed legislation would eliminate individual station licenses for voluntarily equipped vessels and that the Commission would license by rule as is presently done in the Citizens Band service. This delicensing proposal presents us with two problems which need resolution.

The first problem concerns both the maintaining of radio circuit discipline and the awareness of radio regulations, topics mentioned in our February 18th letter. We simply cannot compromise the safety and performance of our vessel traffic services, distress and bridge-to-bridge communications systems by persons unfamiliar with radio telephone procedures and basic regulations. Citizens Band circuit discipline is certainly not acceptable in an environment where movement of large ships and safety of life are dependent upon an effective and reliable maritime mobile VHF-FM radiocommunications system. Fortunately, the current licensing requirement and Commission enforcement mechanisms provide strong incentives for boaters to use their radio equipment correctly.


The second problem, caused by delicensing, concerns the elimination of a key database which associates maritime mobile service identities to individual radio owners, including owners of recreational vessels. These identities are essential to the introduction of the Global Maritime Distress & Safety System (GMDSS) technology in the U.S. The license is currently the U.S. database source for GMDSS electronic identities. It is needed to reduce congestion on VHF voice channels, identify and locate vessels in distress, and combat hoax calls, all through the application of digital selective calling, a component of GMDSS. We will be increasingly dependent upon a complete and accurate database of marine radio identities and user information for search and rescue purposes. We are working closely with your staff on the matter.

Subj: Reply to Chairman Hundt ltr dtd 6 May 1994

In your Report and Order, Commissioner Quello expressed concern, similar to that of the Coast Guard, regarding marine radio license fees and noted his intention to "look very carefully next year when the Commission has some discretion to modify fees, at making cuts that are fair and logical." I strongly support these efforts. In the interim, I recommend you consider options this year to reduce the \$115 up-front fee for marine radio licenses. For example, payments could be spread out to reduce the disincentive for safety a fee of this amount causes.

Thank you for your interest and cooperation in this matter. Our staffs need to establish good dialogue on this issue, and continue to explore the full range of alternatives. I believe a mutually acceptable solution is achievable and that it is in the interest of both our agencies. Most importantly, it is in the best interests of the maritime community.

Sincerely,

A handwritten signature in dark ink, appearing to read "A. E. Henn". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

A. E. HENN  
Vice Admiral, U.S. Coast Guard  
Acting Commandant